



November 17, 2004

***Filed electronically***

Mr. John Muleta, Chief  
Wireless Telecommunications Bureau  
Federal Communications Commission  
445 Twelfth Street, NW  
Washington, DC 20554

Re: Texas RSA 8 West Limited Partnership  
and Lynn County Cellular Limited Partnership  
Hearing Aid Compatibility Report  
WT Docket No. 01-309

Dear Mr. Muleta:

Pursuant to the Commission's *Report and Order*, WT Docket No. 01-309 (rel. Aug. 14, 2003) ("Order") and its subsequent Public Notice (DA 04-630, rel. Mar. 8, 2004), Texas RSA 8 West Limited Partnership and Lynn County Cellular Limited Partnership ("Operators"), by their common general partner, Poka Lambro Telecommunications, Ltd., submit the following report in the form prescribed by the Commission. Each Operator is a Tier III carrier serving portions of rural Texas. As carriers, the Operators have limited access to information responsive to many of the questions posed by the Order, and rely on handset vendors to provide updated information regarding hearing aid compatibility.

(1) Digital Wireless Phones Tested

N/A

(2) Laboratory Used

N/A

(3) Test Results for Each Phone Tested

N/A

(4) Identification of Compliant Phone Models and Ratings According to ANSI C63.19

The Operators are not aware of any compliant handsets.

(5) Report on the Status of Product Labeling

There being no compliant handsets, the Operators have not yet undertaken labeling efforts. The Operators are informed that one of its vendors, Motorola, has been active on the Alliance for Telecommunications Industry Solutions ("ATIS") Incubator for Hearing Aid Compatibility. Motorola reports that it has participated in Incubator Work Group #6 – Labeling, which is comprised of wireless manufacturers, carriers and hearing-impaired user representatives. The Work Group is tasked with creating a standard format for HAC labeling.

(6) Report on Outreach Efforts

As soon as compliant phones are available, or the Operators have a firm commitment from manufacturers regarding delivery dates, the Operators will initiate an outreach program to inform the public of the new handsets capabilities. Motorola reports that it was the only wireless manufacturer exhibiting products usable by people with hearing aids at the 2004 convention of the American Academy of Audiology. In addition, Motorola reports that it plans to make its 5<sup>th</sup> consecutive appearance at the Self Help for Hard of Hearing People convention under a joint ATIS effort.

(7) Information Related to Retail Availability of Compliant Phones

The Operators understand that its major handset suppliers, Motorola and Nokia, both active in the ATIS, will be filing progress reports with the FCC. Motorola informed the Operators that retail availability of compliant phones is projected to be in advance of the FCC's compliance dates. Motorola also reports that since the industry is still working in the ATIS Incubator to learn how to measure phones accurately and reliably per the ANSI C63.19 standard, phones are not available on the retail market until the industry's test labs are validated to measure compliance.

(8) Information Related to Incorporating Hearing Aid Compatibility Features into Newer Models of Digital Wireless Phones

Motorola reports that every Motorola phone shipped in the United States comes with a telecoil in the speaker for the specific purpose of coupling with hearing aid telecoils. Motorola reports that it also offers a variety of models with different form factors, including clam-shell style phones. Motorola reports that its current models work well with hearing aids, especially those hearing aids with adequate immunity to electromagnetic interference.

(9) Any Activities Related to ANSI C63.19 or Other Standards Work Intended to Promote Compliance with the Order

Operators are informed that one of its vendors, Motorola, was a charter author of the ANSI C63.19 document and that Motorola has offered more than 40 comments to revise this standard.

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(10) Total Numbers of Compliant and Non-compliant Phone Models Offered as of the Time of the Report

Currently, no phones certified by manufacturers as compliant are available to the Operators. The Operators currently offer five different handset options to their respective subscribers.

(11) Ongoing Efforts for Interoperability Testing with Hearing Aid Devices

The Operators have no ongoing efforts for interoperability testing with hearing aid devices.

Respectfully submitted,

POKA LAMBRO TELECOMMUNICATIONS,  
LTD., General Partner of Texas RSA 8 West  
Limited Partnership and  
Lynn County Cellular Limited Partnership

By: David McEndree  
David McEndree, CEO  
Poka Lambro Management, LLC,  
General Partner, Poka Lambro  
Telecommunications, Ltd.